

W.SCOTT HEMPHILL
517 Riblett Lane
Wilmington, DE 19808

FILED
U.S. DISTRICT COURT
DISTRICT OF DELAWARE

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

LANCASTER COMPOSITE, INC.,) Case No.: No. 04-1414 S4R
)
Plaintiff,) JURY TRIAL DEMANDED
)
vs.)
)
HARDCORE COMPOSITES OPERATIONS, LLC ,)
)
and W. SCOTT HEMPHILL,)
)
Defendant)
)

DEFENDANT W. SCOTT HEMPHILL'S INITIAL DISCLOSURES
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(A) (1)

Pursuant to rule 26(A) (1) of the Federal Rules of Civil Procedure, Defendant, W. Scott Hemphill (Hemphill) submits the following as his initial disclosures as required.

Identities Of Individuals Likely To Have Knowledge Of Discoverable Information That May Be Used To Support Hemphill's Defense and Counter Claims.

- W. Scott Hemphill

- Jeff Pote, Grant Corboy, George Greene and other ex-employees of Hardcore Composites Operations, LLC (Hardcore) including its officers, engineers and technical personnel.
- Representatives of Coastline Composites, Inc., sales representatives for Hardcore.
- Robert H. Greene and other representatives of Lancaster Composite, Inc., including its corporate officers, engineers, sales and technical personnel, both currently employed and past employees.
- Dr. James Argires, Milan Resanovich and other investors, both current and past, in Lancaster Composite.
- Northeast Concrete Products, LLC including its sales and technical personnel.

DOCUMENTS AND THINGS IN THE POSSESSION OF HEMPHILL THAT MAY BE USED TO SUPPORT HEMPHILLS DEFENCE AND COUNTERCLAIMS

- Hardcore sales and marketing information.
- Initial product development information
- Test data
- Job pictures
- Correspondence regarding patent infringement
- Opinion regarding non validity of Lancaster Composites Claims by the firm of Niles and Niles
- Side by side field test data of the Hardcore product vs. the Lancaster Composites Product.

IDENTITY OF EXPERTS AND THEIR OPINIONS

No experts have been engaged at this time.

Insurance Agreements In Force

No applicable insurance for Hemphill

STATEMENT OF THE BASIS FOR ANY DAMAGES

- Hemphill seeks loss of profits from any sale made by Lancaster Composite utilizing the technology stolen and included in the '594 Patent.
- Hemphill seeks to have Lancaster Composite removed as the inventor of the '594 Patent and Hemphill substituted as the true inventor and owner of the '594 Patent.

Dated this 9th day of September, 2005



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NOTICE OF SERVICE

I, W. Scott Hemphill, hereby certify that on this 9th day of September, 2005, I caused copies of this Notice of Service along with the Defendant W. Scott Hemphill's Rule Of Civil Procedure 26(a)(1) Initial Disclosures to be served as follows:

Via U.S. Mail
Seitz, Van Ogtrop & Green, P. A.
George H. Seitz
222 Delaware Avenue
Suite 1500
P.O. Box 68
Wilmington, DE 19801


W. SCOTT HEMPHILL
517 Riblett Lane
Wilmington, DE 19808
Defendant